

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE:  
CARMEN SOCORRO RIVERA  
GUZMAN  
Social Security: xxx-xx-3608  
  
DEBTOR**

**CASE NO. 18-06035 BKT/O  
  
CHAPTER 13**

**MOTION FOR EXTENSION TIME  
TO OPPOSE TO MOTION FILED AT DOCKET NO. 93**

**TO THE HONORABLE COURT:**

**COMES NOW** Debtor, represented by Legal Partners, PSC., and through the undersigned attorney respectfully represents and prays as follows:

1. Jose Mendez Albarran and Olga Cira Fontán La Santa, hereinafter Mendez Albarrán, on August 14, 2019 filed a motion titled "Motion Requesting Reconsideration To Alter Or Amend Order Granting Avoidance of Lien", hereinafter the motion.
2. The motion fails to meet the legal standard set forth by the case law within the First Circuit, and the arguments made were waived because they are being raised for the first time in the motion for reconsideration as they were not previously risen, and since it does not adhere to the legal standards of abuse of discretion.
3. Mendez Albarran continues to use the motions to amended and alter judgment as a tool to bring arguments for the first time. It is not the first time that Méndez Albarrán attempts the same tactic, which is regrettable. Notwithstanding, because we feel the pattern displayed by Méndez Albarrán should be stopped, we request a 15-day extension of time to

*In re Carmen Socorro Rivera Guzman*

conduct a legal research to properly address and answer the motion, such extension will expire on Monday, September 16, 2019.

**WHEREFORE**, the appearing party respectfully requests that this Honorable Court allows a 15-day extension of time to properly answer and oppose Jose Mendez Albarran's "Motion Requesting Reconsideration To Alter Or Amend Order Granting Avoidance of Lien", said extension to expire on Monday, September 16, 2019.

**I HEREBY CERTIFY** that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification, upon information and belief, of such filing to: Madeleine Llovet Otero, Esq. and Monsita Lecaroz Arribas, Esq., U.S. Trustee's Office, and Alejandro Oliveras Rivera, Esq., in addition to any and all parties registered in this case to receive CM/ECF Notices. We will serve by regular mail this document to any the above-named persons, upon knowing that they are non CM/ECF participants.

**RESPECTFULLY SUBMITTED.**

In Carolina, Puerto Rico, August 29, 2019

**LEGAL PARTNERS, P.S.C.**  
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